



Freshfields Bruckhaus Deringer US LLP

BY ECF

The Honorable George B. Daniels
United States District Judge
Daniel Patrick Moynihan United States Courthouse
Courtroom 11A
500 Pearl Street
New York, NY 10007

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November 23, 2022

Re: In re Terrorist Attacks on September 11, 2001, No. 03-md-01570-GBD-SN

Dear Judge Daniels:

We write in connection with Magistrate Judge Netburn's August 26, 2022 Report & Recommendation, ECF No. 8463, and the judgment creditors' November 10, 2022 objections thereto, ECF No. 8733. We also write in connection with the letter filed on November 18, 2022 by Osen LLC, requesting that the Court set a schedule by which certain Congressional amici may file a motion and amicus brief offering their view on the Terrorism Risk Insurance Act of 2002 ("TRIA"), ECF No. 8763.

We are in contact with a number of former senior government officials with expertise in national security and foreign relations law. Like the Congressional amici represented by the Osen firm, these former government officials are considering whether to submit an amicus brief concerning the interpretations of TRIA found in the Report & Recommendation and the judgment creditors' objections. We anticipate filing a motion for leave to submit an amicus brief on behalf of these officials, along with the proposed brief itself, in the coming weeks.

We submit this letter to respectfully join the Congressional amici's request that the Court enter a schedule by which amici may file their motions and briefs, and support the Congressional amici's proposal for a 45-day period to allow for completion of amici submissions and coordination of signatories.

We thank the Court for its time and consideration.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "David Y. Livshiz", with a long horizontal flourish extending to the right.

David Y. Livshiz

cc: All Counsel